



MEHERRIN RIVER REGIONAL JAIL

Serving the following
Localities:
Brunswick County
Dinwiddie County
Mecklenburg County

Crystal L. Willett
Superintendent

9000 Boydton Plank Road
Alberta, VA 23821
(434) 949-6700
(434) 949-0180 Fax

December 2, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Ms. Dortch,

I am writing to you with a serious concern over the FCC's order reforming Inmate Calling Services (ICS) which was published in the Federal Register on November 13, 2013. The cap on interstate rates will significantly impact operations in our regional jail.

Meherrin River Regional Jail is located in Alberta, Virginia and serves three surrounding counties with populations ranging from 17,474 (Brunswick) to 32,380 (Mecklenburg). Our staff of 149 serves an average daily population (ADP) of 420.

The current FCC Order adopts a 'one size fits all' approach to inmate interstate calling rates for all correctional facilities. Regardless of size, there are very distinct differences between prisons and jails and how time and money are spent to maintain inmate calling systems:

- Average Stay/Turnover
 - Jails: Inmate turnover is constant, resulting in the need to add new inmate accounts, establish new accounts to called parties, as well as removing the accounts when an inmate is released.
 - Prison: Inmate turnover is low, inmates have been sentenced and housed in prisons for extended time periods (years).
 - Overall, the cost to administer an Inmate Calling System in a jail setting is higher because of the constant inmate turnover.
- Free Calls
 - Jails: Because of the constant inmate turnover and pre-trial status of the vast majority of inmates in jails, the requirement for free calls to specific numbers or free calls for account setup is much greater.
 - Prisons: House only convicted inmates, therefore the requirement for free calls is minimal.
 - The cost to provide certain free calls to inmates is considerably greater in jails vs. prisons.

As you can see, administering an Inmate Calling System in a jail is considerably greater than in a prison. The rate caps imposed by the FCC and not allowing commissions as a component of the interstate calling costs simply do not allow for full recovery of costs associated in administering an ICS. This jeopardizes the ability of vendors and the jails to offer inmate calling services to jails.

As noted above, the constant inmate turnover and free call requirements are substantial in jails. The expenses are currently funded by commission income, which is established as part of our local budget. Elimination of the commission with no method of cost recovery for this expense can force Meherrin River Regional Jail, as well as many other jails, to not install the latest security technology or even eliminate the inmate calling service altogether.

Marlene H. Dortch, Secretary
Federal Communications Commission
Page 2

Our staff members monitor and setup call-blocks to prevent inmates from harassing victims through telephone calls. We also block calls from inmates who have protective orders so they will not violate the court order. Call blocking further helps by preventing calls to specific people outside of the jail if a case is still pending.

It is with these justifications that I respectfully request a stay of proceeding number 12-375 until further studies can be completed on cost recovery.

Very truly yours,

A handwritten signature in black ink, appearing to read "Guy Short", written in a cursive style.

Guy Short, IT Director
Meherrin River Regional Jail